

From: [Garyg Miller](#)
To: [Eric Pastor](#)
Cc: [Voskov, Luda](#); [Carlos Sanchez](#); [Barbara Nann](#); [Dipanjana Bhattacharya](#); [Kevin Shade](#); [Susan Roddy](#)
Subject: Re: Proposed Approach to Address Gulfco Tank Farm North Containment Area
Date: 01/07/2011 04:20 PM
Attachments: [Tank Content Concentrations.pdf](#)
[AST Tank Farm Containment Area Soil Excavation Comparison Criteria.pdf](#)
[Figure 1 - Tank Farm Map.pdf](#)
[NEDR Figure 3 - Well Locations.pdf](#)
[Table 24 - Zone A Groundwater Exceedences.pdf](#)

Eric,

The proposed plan below to address the Gulfco Tank Farm north containment area is approved. FYI, EPA's contractors will be on-site and plan to collect sample splits for the verification samples.

Regards,

Gary Miller, P.E.
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▼ "Eric Pastor" ---01/07/2011 10:45:01 AM---Hi Gary -

From: "Eric Pastor" <eric.pastor@pbwllc.com>
To: Garyg Miller/R6/USEPA/US@EPA
Date: 01/07/2011 10:45 AM
Subject: Proposed Approach to Address Gulfco Tank Farm North Containment Area

Hi Gary –

As you know from our previous communications, during the performance of the time critical removal action at the former Gulfco tank farm area, we recently observed that the north containment area floor was constructed of a compacted caliche base material rather than concrete as was previously thought (the south containment area floor was constructed of concrete as anticipated). As indicated in my e-mail to you on December 23, 2010, visible staining of this north containment area caliche floor below the footprint of Tank No. 6 was observed when that tank was removed. In addition, we have recently observed smaller isolated areas of staining below Tank Nos. 2, 15, and 21 in the north containment area (see attached Figure 1 - tank farm map for locations).



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In accordance with our previous communications, I am sending this e-mail to outline our proposed plan for addressing the areas of observed impacts to the north containment area floor and decontaminating that area prior to demolishing sections of the containment area dikes as described in the removal action work plan. I would greatly appreciate it if you could review and comment on these proposed activities at your earliest convenience, so we may proceed with their implementation as soon as possible.

Specifically, we propose to perform the following:

- 1) Focused areas of the caliche floor below the former footprints of Tank Nos. 2, 6, 15 and 21 where visible staining is observed will be excavated. As practical, we propose to excavate the caliche floor and underlying soils as necessary until no visible staining is observed at the floors and walls of each excavated area. In addition, we will scrap and remove the upper approximately two inches of the caliche floor from the balance of the north containment area.
- 2) Excavated soil and caliche will be placed in water-tight roll-off bins staged near the excavation area. One or more representative samples of the excavated material will be collected by the remediation contractor for waste classification and profiling. Following completion of sample analyses and profiling, the excavated material will be shipped off-site for management at one of the facilities specified in Table 6 of the removal action work plan, or an alternative facility certified in advance by EPA as described in the Settlement Agreement.
- 3) Upon reaching the above excavation goal, we will collect verification samples of the caliche floor and/or underlying soil. Specific numbers and locations of verification samples will be selected in the field based on the areas, sizes and configurations of the areas excavated. For planning purposes, it is anticipated that two samples will be collected from the Tank No. 6 footprint and one sample will be collected from each of the Tank Nos. 2, 15, and 21 footprints. These samples will be analyzed for the project volatile organic compound (VOC) and semivolatile organic compound (SVOC) analytes listed in the attached Table 1. Sampling and analytical procedures will be as specified in the Field Sampling Plan (FSP) and Quality Assurance Project Plan (QAPP). Level III analyses and validation will be performed. Analytical results will be compared to the comparison criteria listed in the attached Table 1 on an individual or statistical basis in accordance with EPA guidance. As indicated in Table 1, the comparison criteria are the lower of EPA and TCEQ risk-based screening values for direct contact

with soil by industrial/commercial workers.

- 4) In the event that some areas can not practically be excavated such that visible staining is removed or the extent of impacted caliche/soil is anticipated to preclude effective remediation by excavation, we will contact you to discuss potential in-place remediation options. Pending that discussion and with EPA's concurrence, we will excavate as much material as appropriate and collect verification samples to document VOC and SVOC concentrations in the residual (i.e., post-excavation) soil/caliche.
- 5) Similarly, in the event that the comparison of verification samples described above indicates that residual soil/caliche concentrations exceed comparison criteria, we will contact you to discuss potential in-place remediation options. Pending that discussion and EPA's input, we will propose additional remediation activities for EPA review.
- 6) Following completion of the above excavation and sampling activities, backfilling of excavated areas will be performed as necessary to minimize the potential for accumulation of rainfall in low spots. Containment area berms will subsequently be demolished in accordance with the removal action work plan.

As we discussed and as shown on the attached Figure 3 from the previously submitted Nature and Extent Data Report (NEDR), three monitoring wells (SE6MW09, SF5MW10 and SF6MW11) are located immediately adjacent to or within 50 feet of the north containment area. As part of the RI, samples from these wells were analyzed for the full suite of Site chemicals of interest (COIs). As indicated on page 4 in the attached Table 24 from the NEDR, the only COIs detected in these samples at concentrations exceeding groundwater extent evaluation comparison values were very low and estimated (i.e., J-flagged) concentrations of silver (SE6MW09 and SF6MW11) and gamma-BHC (Lindane) (SF5MW10), neither of which were detected in samples from Tank Nos. 2, 6, 15, and 21 as shown on the attached Table 1 from the removal action work plan.

Thanks for reviewing this description of our proposed work. Please let me know if you have any comments/revisions or need any additional information before we proceed.

Eric Pastor
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Tank Content Concentrations.pdf



AST Tank Farm Containment Area Soil Excavation Comparison Criteria.pdf



Figure 1 - Tank Farm Map.pdf



NEDR Figure 3 - Well Locations.pdf



Table 24 - Zone A Groundwater Exceedences.pdf